



March 23, 2020

FEDERAL EXPRESS

Regional Administrator, Region IV US Environmental Protection Agency Atlanta Federal Center 61 Forsyth Street, SW Atlanta, GA 30303-8960	Ms. Lisa Edwards, Regional Supervisor Division of Air Quality, NCDEQ Winston Salem Regional Office 450 West Hanes Mill Rd., Suite 300 Winston-Salem, NC 27105
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**RE: Update to Notification of Compliance Status – Temporary VCU
40 CFR 63 Subpart BBBBBB
Kinder Morgan Southeast Terminals (KMST) – Guilford Terminal
Air Quality Permit 02585R22**

To Whom It May Concern:

Please find the enclosed GDGACT Notification of Compliance Status (NOCS) update for the installation of a temporary VCU (open flare) at the Kinder Morgan Guilford terminal in Greensboro NC, as required by 40 CFR 63.9(h) as referenced by 63.11093(b). The temporary VCU will be in used until the existing Vapor Recovery Unit (VRU) is upgraded, as approved thorough a permit modification issued by the NCDEQ on 12/11/2019.

The loading rack emissions will be temporarily controlled by a Vapor Combustion Unit (open flare). During this time, compliance will be demonstrated by using the attached daily visible emissions form.

Should additional information regarding this NOCS be required, please contact Johnny Tapia at 704-249-9936 or by email at johnny_tapia@kindermorgan.com.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. W. Melton', is written over the printed name.

Wes Melton
Director of Operations
Kinder Morgan Southeast Terminals

Attachment

CC: Barry Furr, KMST GN1

Flare Observation Form with Method 22

Date:	Observer:
Location:	
Weather Conditions (Clear, Cloudy, Raining, snowing etc.):	Wind Direction/Speed:
Sketch mobile flares location relative to the observation location. Estimate distance between the flare and the observation point.	

	Clock Time	Observation period Duration (minutes: seconds)	Accumulated emission Time (minutes: seconds)
Begin Observation period			
End Observation Period			

PROCEDURE:

- This procedure includes a daily observation period of no less than 5 minutes.
- Visually Check for Any Leaks or Smoke during the 5 minutes you observe, if there is smoke you will need to continue from the time smoke is first observed to ensure the visible emissions (smoke) does not exceed 5 minutes. Then stop and record.
- If the visible emissions (smoke) exceeds 5 minutes then we have noncompliance, which is reportable to the Agency.
- If visible emissions (smoke) is observed exceeding 5 minutes, then the flare should stop to determine the cause of the smoke. Once the cause is corrected or the flare is adjusted, then the flare can be restarted.
- Smoking during periods of startup or shutdown do not count toward exceeding the visible emissions threshold of 5 minutes.